



1050 Matador Dr. SE  
Albuquerque, New Mexico 87123

**MISSION:**

To Promote The Establishment Of The  
National Wildlife Refuge Service  
As A Separate Agency Within The  
U. S. Department Of The Interior

August 25, 2005

Mr. Don Hultman, Refuge Manager  
Upper Mississippi River National Wildlife & Fish Refuge  
51 East Fourth Street, Room 101  
Winona, MN 55987

Attn: CCP Comments

Dear Mr. Don Hultman:

These comments are submitted by the Blue Goose Alliance, a national, non-profit environmental organization dedicated to the protection and perpetuation of the National Wildlife Refuge System (NWRS), and to the legislative creation of a separate agency within the Department of the Interior dedicated exclusively to the administration of the NWRS. Alliance Affiliates across the Nation monitor activities and actions on National Wildlife Refuge areas and recommend for organizational actions the units and activities deemed most likely to bring improvements affecting the System as a whole, and serve to inform interested Americans of significant NWRS issues.

The Upper Mississippi River National Wildlife and Fish Refuge (UMRNWR) is recognized by the Alliance and many other Americans as a national treasure. It is one of our Nation's most outstanding natural resource areas, with especially superb fish and migratory bird values. It is an area with captivating natural beauty, and its lands and waters played a vital role in the exploration, settlement, and development histories of the United States. It is a special place that is greatly loved and appreciated by large numbers of people who use the refuge for recreational or economic purposes. But the UMRNWR is at risk. In recent years the Upper Mississippi River has been designated as one of the ten most endangered rivers in the country. Its habitats have been damaged by polluted agricultural and storm-water runoff, sedimentation, invasive species and by the manipulation of water levels for commercial navigation and flood control purposes.

We commend the Refuge administrators within the U.S. Fish and Wildlife Service for undertaking a comprehensive conservation planning process (CCP) for the UMRNWR that addresses these along with other pressing problems. The extent and nature of this far-flung refuge requires an especially careful evaluation and planning effort. For example, the legislation establishing the refuge called for conservation of fish, mollusks, and plants (including aquatic plants), as well as the native wildlife. Each of these organisms represented a "first" in terms of specified primary purposes for the National Wildlife Refuge System. Extensive, highly valuable historical and cultural resources within the refuge call for sensitive management practices and adherence to several statutes guiding objectives and programs for those resources. Many other unique features, species, ecotypes, and uses on this refuge obviously bring challenges seldom

found within a single federal conservation-oriented management unit. The identified need for developing a fifth alternative for the CCP, extending the public comment period, and responding to the numerous, well-considered statements already submitted to the refuge, is logical and appropriate. The Alliance fully endorses this extra effort and outreach to better include representatives from all of the diverse user groups served by the UMRNWR.

Once the plan has been completed and accepted by the many publics served by and invested in the refuge, a systematic, well-designed natural resources monitoring program should be developed and operated in tandem with plan elements to ensure that changes brought about by powerful external forces, as well as the internal refuge activities and uses, are periodically measured, evaluated and, when appropriate, result in adjustments to refuge operations, regulations, programs and cooperative actions. This concept is supported by the existing history of the refuge, when substantial periods of time have separated evaluations and resulting operations, etc., of refuge management. A more formal and directed effort, and more frequent assessment, is warranted and necessary to assure the continuing compatibility of activities and uses of this extensive series of important habitats.

The Alliance believes it is critical that the management of the UMRNWR focus on ensuring a healthy, vibrant ecosystem that supports the full diversity of native fish, wildlife, and plant communities found in the refuge habitats. In addition, certain "exotics," such as pheasants have become widely-accepted components of the refuge biota. All human uses, including those that are fish, wildlife and plant resources dependent, and those that are not living natural resource-related activities, must be permitted only to the extent they are made to be compatible with achieving the primary refuge purposes. Closed areas and non-motorized zones to provide complete sanctuary conditions for wildlife reproduction within the refuge and others for wildlife feeding and resting sites, fish spawning areas and other recognized special needs should be considered basic, required management strategies for the UMRNWR. Regulating all uses of the refuge to ensure compatibility with all primary purposes is required by NWRS guiding statutes and sound natural resource management practice. Cooperation between refuge management and the several local and regional governments, other federal agencies, commercial interests, and key representatives of the millions of public users will be vital to the success of the final plan, and to proper protection of the numerous natural, cultural and historical resources within the refuge.

The proposal to establish non-motorized quiet zones will provide places for the rapidly growing number of people who wish to enjoy nature within an ambiance of only natural sounds. Bird watchers, photographers, hunters, anglers and others using canoes, kayaks and electric-motor propelled craft will be able to enjoy the refuge without the peace-shattering, intrusive, noisy and disruptive externalities associated with large speed boats, jet-skis, airboats and other similar motorized craft. As noisy watercraft proliferates within the refuge, quiet areas suitable for quiet contemplation, family-oriented tranquility, and true "re-creation" are very obviously becoming much scarcer. National Wildlife Refuges should provide a clear distinction from the vast non-refuge areas where such craft are

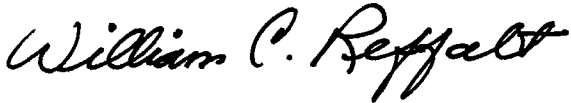
abundant and largely unregulated. The refuge fish, wildlife and plants require, and will thrive upon such sanctuary, and the visiting public deserves experiences freed from the intrusive and noisy invasions of privacy often experienced in non-refuge areas.

In brief summary, the Blue Goose Alliance recommends that as the planners and refuge manager undertake to develop a new, consolidated, and responsive preferred alternative, strong consideration be given to building in the following concepts:

- 1) Current Alternative "D" should serve as a foundation for the final UMRNWR CCP.
- 2) Management of the refuge's natural resources must be the primary focus of refuge operations, with human uses — the fish, wildlife, and plant dependent and non-wildlife related activities (when deemed allowable) — accepted only to the extent they are made to be, and remain, compatible with achievement of primary refuge purposes, particularly ecosystem protection and management.
- 3) The waterfowl hunting closed areas should be carefully evaluated to maximize perpetuation of the waterfowl resources as well as to ensure provision of important experiential rewards to the waterfowl hunters in the open areas. A combination of refuge areas completely closed, seasonally closed, closed to all except specified uses, and "may be closed for various periods under specific circumstances" should be developed and operated to ensure the necessary balance between wildlife needs and desired visitor and user benefits.
- 4) Quiet, non-motorized zones should be provided for visitors, including waterfowl hunters, wishing to experience the refuge's natural sounds unimpaired by wailing and physically intrusive machinery. Evaluation of such a program will likely be necessary to maintain support, and ensure that program design is effective and appropriate.
- 5) A formal monitoring program should be a "built-in" element of the CCP to permit refuge management to determine when and to what extent changes have occurred and require responsive actions.
- 6) It is vital to the entire CCP concept that the refuge seeks annual funding levels commensurate with intended plan operation levels and to ensure that essential resources are available for key elements of the plan. Refuge management, and regional administrators must be prepared to curtail lower priority, or inadequately, partially, or totally unfunded program elements to ensure that a balanced implementation takes place. Congressional support for the plan is vital and can only be achieved with strong public support. The strongest public support will only be achieved by insuring that elements in the plan that serve the widest array of users, and interests, will be properly funded.

There are numerous elements of importance to the UMRNWR CCP that the Alliance elected not to make comment upon at this time. However, Alliance Affiliates will monitor the continuing planning process and ultimately the implementation process and will offer comment when appropriate. The Blue Goose Alliance appreciates this opportunity to comment and to be a part of this vital effort by the refuge to seek assistance from stake-holders in developing future program focus for the UMRNWR.

Sincerely yours,

A handwritten signature in black ink, reading "William C. Reffalt". The signature is written in a cursive style with a large, stylized "W" and "R".

William C. Reffalt, President